

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER, JOHN
DOES 1 THROUGH 5, and JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON
CORPORATION'S MOTION TO IMPOUND THEIR OPPOSITION
TO PLAINTIFF SHAREHOLDER.COM'S MOTION TO COMPEL
DEFENDANTS CCBN.COM AND THOMSON CORPORATION TO
CONDUCT SEARCHES OF CCBN.COM'S ELECTRONIC BACKUP TAPES**

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson") (collectively, "Defendants") submit this Motion to Impound their Opposition to Plaintiff Shareholder.com's Motion to Compel Defendants CCBN.com and Thomson Corporation to Conduct Searches of CCBN.com's Electronic Backup Tapes (the "Opposition").

Impoundment is necessary because the Opposition contains references to, and attaches copies of, documents produced by defendants that have been designated as "Highly Confidential" under the terms of the Stipulated Protective Order (attached as Exhibit A).

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON
CORPORATION,

By its attorneys,

/s/ Jennifer L. Chunias
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DATED: July 12, 2005

LOCAL RULE 7.1A(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for Defendants conferred with counsel for Plaintiff in a good faith effort. Counsel for Plaintiff does not assent to the motion.

/s/ Jennifer L. Chunias

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